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January 28, 2020

BY ECF

Hon. Jesse M. Furman
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

RE. *Massi v. Salvioni, et al.*, 19cv10097 (JMF)(DCF)

Dear Judge Furman:

I represent the plaintiff in the above referenced action and submit this joint letter motion to request an extension of time to seek a mediation conference, file a joint letter and proposed Case Management Plan. The joint letter and proposed Case Management Plan are due on February 6, 2020. Additionally, parties seek an adjournment of the initial conference scheduled for February 13, 2020. This is parties first request for an extension of time and an adjournment and the request does not affect any other deadlines in this matter.

We have exchanged a proposed Settlement Agreement and Defendant Jai Muktinath Inc. has retained an expert who has inspected the property in question and issued a report. Parties are negotiating the terms of settlement and are optimistic that we shall resolve this action without the need of mediation or commence discovery. Consequently, in an effort to minimize an increase of attorney's fees and costs, we propose an extension of time to seek a mediation by February 28, 2020, and file a joint letter and proposed Case Management Plan, and a four-week adjournment of the initial conference. This short adjournment will give parties an opportunity to resolve several unresolved issues.

In an effort to determine an adjourned date, parties identify the following dates where all counsel are available: March 23, 2020, March 25, 2020, and March 26, 2020.

Thank you very much for your consideration and are available to address any questions the court may have.

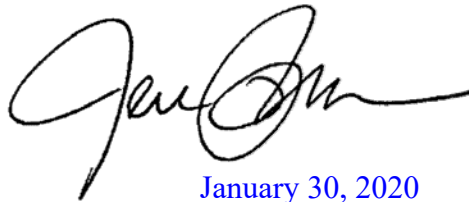
Respectfully Submitted,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (via ECF)
Kevin M. Ryan, Esq.
Attorneys for Jai Muktinath Inc. dba Subway
Nicoletti Gonson Spinner Ryan Gulinp Pinter LLP

Application GRANTED. The initial conference is RESCHEDULED to March 26, 2020, at 3:15 p.m. The parties shall participate in a mediation at least two weeks before the initial conference, ECF No. 7, and submit the required joint letter and proposed civil case management plan and scheduling order by Thursday of the week before the conference, ECF No. 6. The Clerk of Court is directed to terminate ECF No. 17. SO ORDERED.

A handwritten signature in black ink, appearing to read "Jai Muktinath", is written over the date. The signature is fluid and cursive.

January 30, 2020